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July 29, 2014

RECEIVED

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VIA EMAIL

The Honorable Tonianne J. Bongiovanni, U.S.M.J. United States District Court District of New Jersey Clarkson S. Fisher Building & U.S. Courthouse, Courtroom 6E 402 East State Street Trenton, NJ 08208

AT 8:30_____M WILLIAM T. WALSH CLERK

Re: ZoomEssence, Inc. v. International Flavors and Fragrances, Inc., No. 3:12-CV-01471

Dear Judge Bongiovanni:

We represent Plaintiff ZoomEssence, Inc. ("ZoomEssence") in the above-captioned action. We write to request an extension of time to submit ZoomEssence's opposition to Defendant International Flavors & Fragrances Inc.'s ("IFF") recently-filed Motion for Leave to File Amended Answer, Counterclaims, and Jury Demand (the "Motion"). (Dkt. Nos. 159-161.) ZoomEssence's opposition to the Motion is currently scheduled to be submitted on August 4, 2014. IFF's reply to ZoomEssence's opposition is scheduled to be submitted on August 11, with the return date for the Motion scheduled for August 18.

ZoomEssence respectfully requests that the Court permit it to submit its opposition to the Motion on September 22. IFF is scheduled to produce a significant population of documents on July 31; ZoomEssence will require time to review and incorporate those documents into its opposition. Further, as IFF completed its production of audio recordings and corresponding transcripts on July 23, ZoomEssence requires additional time to review and integrate these materials as well. Finally, counsel for ZoomEssence will be away from the office for vacation during portions of the month of August. The Court indicated during the recent conference of July 16 that it would be amenable to such an extension.

As such, we respectfully request that the Court grant ZoomEssence an extension of time to reply to the Motion until September 22, 2014. IFF's reply to the Motion would be submitted on September 29, 2014, with a return date of October 6, 2014.

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Thank you for your consideration of this matter.

Respectfully submitted,

Lita Beth Wright

cc: Paul H. Schafhauser, Esq. (via email)

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